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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

RONALD M. JANUS,
 Plaintiff,

vs.

SILVERTON CASINO, LLC, a Nevada
 limited liability company,
 Defendant.

Case No.: 2:24-cv-01940-APG-MDC

**STIPULATION AND ORDER
 TO EXTEND DISCOVERY**

(Second Request)

Plaintiff RONALD M. JANUS and Defendant SILVERTON CASINO, LLC, a Nevada limited liability company, by and through their respective counsels of record, hereby STIPULATE and AGREE to amend the Stipulated Discovery Plan and Scheduling Order, ECF No. 13, and the Stipulation and Order to Extend Discovery (First Request), ECF No. 22, to extend the discovery period in this case for an additional thirty (30) days, from August 18, 2025, to **September 17, 2025**. This is the second extension of the discovery period that has been requested in this matter. The original discovery cut-off in this case was set for May 19, 2025.

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1. DISCOVERY COMPLETED TO DATE:

1. Plaintiff served his initial disclosures, as required under Fed. R. Civ. P. 26(a)(1)(A), on January 10, 2025.

a. Plaintiff served his “First Supplement to Plaintiff’s Initial Disclosures” on May 1, 2025.

b. Plaintiff served his “Second Supplement to Plaintiff’s Initial Disclosures” on July 17, 2025.

2. Defendant served its initial disclosures, as required under Fed. R. Civ. P. 26(a)(1)(A), on January 21, 2025.

3. On April 9, 2025, Plaintiff served “Plaintiff’s First Set of Interrogatories” on Defendant. Defendant served its verified responses on May 30, 2025.

4. On April 9, 2025, Plaintiff served “Plaintiff’s First Set of Requests for Production of Documents” on Defendant. Defendant served its responses on May 30, 2025.

5. On May 30, Defendant served “Defendant Silverton Casino, LLC’s First Set of Interrogatories to Plaintiff.” Plaintiff served his verified responses on July 7, 2025.

6. On May 30, Defendant served “Defendant Silverton Casino, LLC’s First Set of Requests for Production of Documents to Plaintiff.” Plaintiff served his responses on July 7, 2025.

7. Based on the documentation requested in this matter, the parties entered into discussions over the terms of a protective order to allow for the production of confidential documentation. The parties submitted their “Stipulated Protective Order,” ECF No. 23, to the Court on June 11, 2025. The court approved the Stipulated Protective Order, ECF No. 25, on June 23, 2025.

8. On June 27, 2025, Defendant served “Defendant Silverton Casino, LLC’s First Set of Requests for Admissions to Plaintiff.” Plaintiff’s responses are due on July 28, 2025.

9. On July 23, 2025, Defendant completed the deposition of Plaintiff.

2. DISCOVERY YET TO BE COMPLETED:

Plaintiff intends to take depositions of the following persons identified in Plaintiff’s Initial Disclosures:

- 1 a. Michael Hicks;
- 2 b. Catherine Macari;
- 3 c. Teresa Hilton; and
- 4 d. The designee pursuant to Fed. R. Civ. P. 30(b)(6) of a person knowledgeable of the
- 5 grounds for Plaintiff's termination and the company's decision making process regarding the
- 6 termination, including the identification of the individual or individuals who the decision to
- 7 terminate Plaintiff's employment.

8 Defendant intends to supplement its document production following the Court entering the
9 Stipulated Protective Order submitted by the parties.

10 **3. REASONS WHY REMAINING DISCOVERY HAS NOT YET BEEN COMPLETED:**

11 Because of the work schedule of Plaintiff's counsel, and because Plaintiff's counsel is
12 waiting for the supplemental document production following the Court entering the Stipulated
13 Protective Order submitted by the parties, Plaintiff's counsel has not yet conducted depositions.

14 Defendant expects to be able to produce the supplemental document production during the
15 week of July 28, 2025. However, because Defendant's counsel has an arbitration scheduled for the
16 first two weeks of August, and is therefore unavailable until after August 20, 2025, which is after
17 the scheduled close of discovery, the four depositions cannot be scheduled within the current
18 discovery period.

19 **4. REVISED DISCOVERY PLAN:**

20 1. Discovery Cut-Off Date: September 17, 2025. As set forth in the Stipulation and
21 Order to Extend Discovery (First Request), ECF No. 22, the discovery cut-off currently is set for
22 August 18, 2025. In the original Stipulated Discovery Plan and Scheduling Order, ECF No. 13, the
23 discovery cut-off was set for May 19, 2025.

24 2. Amending the Pleadings and Adding Parties: In the original Stipulated Discovery
25 Plan and Scheduling Order, the deadline for filing motions to amend the pleadings or to add parties
26 was set for February 18, 2025, 90 days prior to the original close of discovery. This deadline has
27 passed and, therefore, is not being extended in this stipulation.

28 3. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):

a. In the original Stipulated Discovery Plan and Scheduling Order, the deadline for disclosures concerning experts was set for March 20, 2025, 60 days prior to the original close of discovery. This deadline has passed and, therefore, is not being extended in this stipulation.

b. In the original Stipulated Discovery Plan and Scheduling Order, the deadline for disclosures concerning rebuttal experts was set for April 21, 2025, 30 days prior to the original close of discovery. This deadline has passed and, therefore, is not being extended in this stipulation.

4. Dispositive Motions: The date for filing dispositive motions shall be not later than **October 17, 2025**, 30 days after the new discovery cut-off date.

5. Pretrial Order: The date for filing the joint pretrial order shall be not later than **November 17, 2025**, 30 days after the date set for filing dispositive motions. In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days after decision on the dispositive motions or until further order of the court.

6. Fed. R. Civ. P. 26(a)(3) Disclosures: As set forth in the original Stipulated Discovery Plan and Scheduling Order, the disclosures required by Fed. R. Civ. P. 26(a)(3), and any objections thereto, shall be included in the pretrial order.

7. Additional Extensions of the Discovery Period: The last day for the parties to file their Motion and/or Stipulation to Extend Discovery shall be **August 27, 2025**, twenty (21) days prior to the revised discovery cut-off.

Therefore:

Deadline	Current Deadline	New Deadline
Discovery Cut-Off	August 18, 2025	September 17, 2025
Last Day to Extend Discovery	July 28, 2025	August 27, 2025
Dispositive Motions	September 17, 2025	October 17, 2025
Pre-Trial Order	October 17, 2025	November 17, 2025

1 No trial date has yet been ordered.

2 DATED: July 28, 2025.

DATED: July 28, 2025.

3 LAW OFFICES OF ROBERT P. SPRETNAK

KAMER ZUCKER ABBOTT

4 By: /s/ Robert P. Spretnak
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7 Attorney for Ronald M. Janus, Plaintiff

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8 Attorneys for Silverton Casino, LLC, Defendant

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IT IS SO ORDERED.

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Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
DATED: 7/29/2025

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